

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 16-mj-4028-DHH
	)	
EDMOND P. LAFRANCE	)	

**JOINT MOTION TO CONTINUE PROBABLE CAUSE HEARING**

Defendant, Edmond P. LaFrance, and the United States Government by and through their respective attorneys hereby move that the probable cause hearing, now scheduled for March 1, 2016, be continued to April 5, 2016, or to another date thereafter convenient to the Court. As reason for this request, the parties state that they would like the opportunity to continue preliminary discussions concerning the disposition of this matter, possibly by way of information, and require additional time to complete negotiations. Government counsel will be out of the District for two and a half weeks, making such discussions impractical between now and when the case would otherwise need to be indicted. The defendant consents to this continuation pursuant to Fed. R. Crim. P. 5(c), and the parties agree that the period of time commencing on January 28, 2016 and concluding on the next scheduled date for a probable cause hearing is excludable under the Speedy Trial Act.

WHEREFORE, the parties respectfully submit that good cause exists to continue this matter and request that this Court

continue the probable cause hearing to April 5, 2016 or a date thereafter convenient to the Court.

Edmond P. LaFrance

By His Attorney,

/s/ Jessica Thrall  
Jessica Thrall  
Federal Defender Office  
51 Sleeper St., Fifth Floor  
Boston, MA 02210  
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Jessica Thrall, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on February 2, 2016.

/s/ Jessica Thrall  
Jessica Thrall